

IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. CROIX

_____)	
CONSTANCE ALEXANDER, <i>et al.</i>)	
)	
Plaintiff,)	CASE NO. 1:20-CV-00038
)	_____
v.)	JURY TRIAL DEMANDED
)	
STEADFAST INSURANCE COMPANY,)	
<i>et al.</i> ,)	
)	
Defendants.)	
_____)	

**DEFENDANT STEADFAST INSURANCE COMPANY'S
NOTICE OF INTENT TO SERVE SUBPOENAS DUCES TECUM**

TO: GLENDA L. LAKE, ESQ.
Clerk of The District Court
Almeric L. Christian Federal Building
3013 Estate Golden Rock, Suite 219
St. Croix, VI 00820

COUNSEL OF RECORD

Defendant, **STEADFAST INSURANCE COMPANY ("STEADFAST")**, through undersigned counsel, W. Mark Wilczynski, Esq. of the Law Office of W. Mark Wilczynski, P.C., and pursuant to Rule 45 of the Federal Rules of Civil Procedure, provides notice of its intent to serve Subpoenas Duces Tecum as soon as service may be effected, directed to **Tom Crossland**, c/o Crosstech Boiler Services, L.P., 555 Republic Drive, Ste. 117, Plano, TX 75074 and directed to **Crosstech Boiler, Services, L.P.** c/o Breazeale, Sachse & Wilson LLP, Agent, One American Place, Suite 2300, Baton Rouge, LA 70821-3197, who are not parties, for the purpose of taking the depositions in the above referenced matter.

Alexander, et al. vs. Steadfast Insurance Company, et al.
Civil No.: 1:20-CV-00038
Defendant Steadfast Insurance Company's Notice of Intent to Serve Subpoenas Duces Tecum

Copies of the subpoenas are attached hereto as **Exhibits A and B**.

Respectfully Submitted,

DATED: August 18, 2023

/s/ W. Mark Wilczynski
W. MARK WILCZYNSKI, ESQ.
Law Office of W. Mark Wilczynski, P.C.
Attorney for:
STEADFAST INSURANCE COMPANY
48 Kongens Gade – PO Box 1150
St. Thomas, Virgin Islands 00804-1150
Tel: (340) 774-4547
Email: mark@usvilaw.com
V.I. Bar No. 515

CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that on this 18th day of August 2023, I caused a true and correct copy of the foregoing **DEFENDANT STEADFAST INSURANCE COMPANY'S NOTICE OF INTENT TO SERVE SUBPOENAS DUCES TECUM**, to be served via electronic mail on:

LEE J. ROHN, ESQ.
JENNIFER SUE KOOCKOGEY, ESQ.
1101 Kings Street
Christiansted, St. Croix
U.S Virgin Islands 00820
Emails: lee@rohnlaw.com
jennifer@rohnlaw.com
ATTORNEYS FOR PLAINTIFFS

By: /s/ W. Mark Wilczynski